



August 10, 2020

DVP-200020

Air Division Director  
U.S. Environmental Protection Agency  
Attn: AIR-5  
75 Hawthorne Street  
San Francisco, California 94105

Subject: Desert View Power monitoring report for six-month period February 02, 2020 to August 02, 2020.

Dear Sir:

In compliance with our permit, Permit No. CB-OP 99-01, enclosed is the monitoring report for the six-month period of February 02, 2020 to August 02, 2020 for Desert View Power

- Form sixmon – 6-Month Monitoring Report Parts A through E inclusive.
- Form CTAC.
- Excess Emissions and inoperative report February 02, 2020 to August 02, 2020.
- Monthly reports for August 02, 2019 to February 02, 2020 will be retained on site.
- Copy of 500N AQMD form completed during reporting period.

If you have questions or comments, please feel free to call us at (760) 262-1653.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Robertson".

Jim Robertson  
Plant Manager

Desert View Power, Inc. an affiliate of



**Greenleaf  
POWER**

Air Pollution Control Officer

Attention: Mr. David Jones, AQMD Supervisor

South Coast Air Quality Management District

21865 E. Copely Drive

Diamond Bar, CA 91765-4182

## U.S. ENVIRONMENTAL PROTECTION AGENCY

## APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

APPLICATION FORM CTAC - CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS BY RESPONSIBLE OFFICIAL

INSTRUCTIONS: One copy of this form must be completed, signed, and sent with each submission of documents (i.e., application form 1S, updates to applications, reports, or any information required by a part 71 permit).

## A. Responsible Official

Name: (Last) Robertson (First) Jim

Title Facility ManagerStreet or P.O. Box 62-300 Welmas DrCity Mecca State CA ZIP 92254Telephone (760) 396-2554 Ext. 113 Facsimile (760) 396-0410

## B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed)  Date: 8/05/2020Name (typed) Jim Robertson Date: 8/05/2020

## U.S. ENVIRONMENTAL PROTECTION AGENCY

## FORMS FOR FEDERAL OPERATING PERMITS PROGRAM, 40 CFR PART 71

FORM. SIXMON - 6-MONTH MONITORING REPORT

A-Identifying Information. All facilities must complete this section.

Source or company name Desert View Power

Mailing address: Street or P.O. Box 62-300 Gene Welmas Dr PO Box 758

City Mecca

State: CA ZIP 92254-0758

Contact person: Jim Robertson Title: Facility Manager

Telephone(760) 396-2554\_ Ext. 113

Part 71 permit no. CB-OP 99-01

B. Reporting Period. You must complete this section. The reporting period should be the 6-month, or shorter period, required by your part 71 permit.

It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning: 02/02/2020

Period ending: 08/02/2020

---- CONTINUED ON NEXT PAGE ----



All sources must complete this section. Use the table below to summarize all deviations from permit terms required to be reported previously (prior to this report). Copy this page as many times as necessary to include all such deviations. In the first column, describe and cross-reference the permit terms for which there is a deviation. In the second column, list the Emission unit IDs where the deviation occurred, if no IDs are listed in the permit, describe them instead. When reporting the beginning and ending times for deviations, use the 24-hour clock (e.g., midnight or 12 a.m. is 00:00). Zone means time zone (e.g., EST or EDT). In the fourth column, specify the date when the written deviation report was submitted to the permitting authority. If a written deviation report was required, but it was not submitted by the required deadline, leave this field blank. Failure to submit a required deviation report (including those required to be submitted by telephone or fax), or late submittal of such reports is a deviation from permit terms that must be reported in Section E of this form.

| Permit Tenn for Which There is a Deviation          | Emission Units (unit IDs) | Deviation Time Periods |               |           | Written Deviation                      |
|---|---------------------------|------------------------|---------------|-----------|--|
|   |                           | Date (mo/day/yr)       | Time (hr/min) | Time Zone | Report Submittal Date<br>(mo/day/year) |
| All deviations are listed under "E" of this report. |                           | Beginning              |               |           |  |
|   |                           | Ending                 |               |           |  |
|   |                           | Beginning              |               |           |  |
|   |                           | Ending                 |               |           |  |
|   |                           | Beginning              |               |           |  |
|   |                           | Ending                 |               |           |  |
|   |                           | Beginning              |               |           |  |
|   |                           | Ending                 |               |           |  |
|   |                           | Beginning              |               |           |  |
|   |                           | Ending                 |               |           |  |
|   |                           | Beginning              |               |           |  |
|   |                           | Ending                 |               |           |  |

## Form SIXMON Continued

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## E. Other Deviations From Permit Terms

All sources must complete this section. Answer questions 1 through 5 below as a group for each deviation from permit terms that is required to be reported for the first time in this monitoring report form. This page may be used to report three separate deviations. Copy of this page as many times as necessary to include all such deviations. Include all such deviations, including those that occur during startup, shutdown, malfunctions, and upset conditions. Question 1: describe and cross reference the permit terms for which there is a deviation. Question 2: list Emission unit ID (if not available, identify by some other method) where the deviation occurred. Question 3: Report the beginning and ending times for each deviation, use the 24-hour clock. Question 4: Briefly explain (If known) the probable cause of each deviation from permit terms. Question 5: If any corrective actions or preventative measures were taken to avoid these same types of deviation at the same emissions units, briefly describe them. If known include dates when such actions or measures were taken or will be taken in the future.

|   |   |  |
|---|---|--|
| 1. Permit Term for Which There is a Deviation:<br><b>"See attached pages"</b><br><b>Permit Condition II. E. 2</b> | 2. Emission Units (unit IDs):<br><br><b>01</b>      | 3 Time Period: Date (mo/day/yr) Time (hr:min) Time Zone<br>Beginning <u>  /  /  </u><br>Ending <u>  /  /  </u> |
| 4. Probable Cause of Deviation:   | 5. Corrective Actions or Preventive Measures Taken: |  |

|  |   |  |
|--|---|--|
| 1. Permit Term for Which There is a Deviation: | 2. Emission Units (unit IDs):                       | 3 Time Period: Date (mo/day/yr) Time (hr:min) Time Zone<br>Beginning <u>  /  /  </u><br>Ending <u>  /  /  </u> |
| 4. Probable Cause of Deviation:                | 5. Corrective Actions or Preventive Measures Taken: |  |

|  |   |  |
|--|---|--|
| 1. Permit Term for Which There is a Deviation: | 2. Emission Units (unit IDs):                       | 3 Time Period: Date (mo/day/yr) Time (hr:min) Time Zone<br>Beginning <u>  /  /  </u><br>Ending <u>  /  /  </u> |
| 4. Probable Cause of Deviation:                | 5. Corrective Actions or Preventive Measures Taken: |  |

## Boiler 1 Excess Emissions

Colmac Energy

NOx ppm @3% O2 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*



## Boiler 1 Excess Emissions

Colmac Energy

NOx lb/mmbtu 30 SOD Rlg Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

NOx lb/hr 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

NOx lbs/day Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

SO2 ppm @3% O2 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

SO2 ppm @3% O2 30 SOD Rlg Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

SO2 lb/mmbtu 30 SOD Rlg Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

SO2 lb/hr 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 Excess Emissions

Colmac Energy

CO ppm @3% O2 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*



## Boiler 1 Excess Emissions

Colmac Energy

CO lb/hr 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

NOx ppm @3% O2 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

NOx lb/mmbtu 30 SOD Rlg Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

NOx lb/hr 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

NOx lbs/day Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

SO2 ppm @3% O2 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

SO2 ppm @3% O2 30 SOD Rlg Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

SO2 lb/mmbtu 30 SOD Rlg Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*



## Boiler 2 Excess Emissions

Colmac Energy

SO2 lb/hr 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

CO ppm @3% O2 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 2 Excess Emissions

Colmac Energy

CO lb/hr 3-Hr Rolling Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boilers Stack Excess Emissions

Colmac Energy

Opacity % 3-Min Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boilers Stack Excess Emissions

Colmac Energy

Opacity % 6-Min Avg Excess Emissions for 2/2/2020 thru 8/2/2020

| Parameter | Start | End | Duration | Value | Min | Max | Limit | Reason | Action |
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|
|-----------|-------|-----|----------|-------|-----|-----|-------|--------|--------|

*There are no excess emissions for this report.*

## Boiler 1 CEMS Downtime

Colmac Energy

NOx ppm @3% O2 CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| NOx ppm @3% O2 | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| NOx ppm @3% O2 | 3/29/2020 12:00 AM | 9:59 AM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 3/31/2020 4:00 AM  | 10:59 AM | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx ppm @3% O2 | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx ppm @3% O2 | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| NOx ppm @3% O2 | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| NOx ppm @3% O2 | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| NOx ppm @3% O2 | 6/2/2020 4:00 AM   | 4:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx ppm @3% O2 | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 7/31/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 49 hours |                                     |   |

## Boiler 1 CEMS Downtime

Colmac Energy

NOx lb/mmBtu CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| NOx lb/mmBtu   | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| NOx lb/mmBtu   | 3/29/2020 12:00 AM | 9:59 AM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 3/31/2020 4:00 AM  | 10:59 AM | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/mmBtu   | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/mmBtu   | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| NOx lb/mmBtu   | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| NOx lb/mmBtu   | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| NOx lb/mmBtu   | 6/2/2020 4:00 AM   | 4:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/mmBtu   | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 7/31/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 49 hours |                                     |   |

## Boiler 1 CEMS Downtime

Colmac Energy

NOx lb/hr CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| NOx lb/hr      | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| NOx lb/hr      | 3/29/2020 12:00 AM | 3:59 AM  | 4 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 3/29/2020 5:00 AM  | 2:59 PM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 3/31/2020 4:00 AM  | 7:59 AM  | 4 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/hr      | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/hr      | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| NOx lb/hr      | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| NOx lb/hr      | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| NOx lb/hr      | 6/2/2020 4:00 AM   | 4:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/hr      | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 7/31/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 50 hours |                                     |   |



## Boiler 1 CEMS Downtime

Colmac Energy

SO2 ppm @3% O2 CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| SO2 ppm @3% O2 | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| SO2 ppm @3% O2 | 3/29/2020 12:00 AM | 9:59 AM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 3/31/2020 4:00 AM  | 10:59 AM | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 ppm @3% O2 | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 ppm @3% O2 | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| SO2 ppm @3% O2 | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| SO2 ppm @3% O2 | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| SO2 ppm @3% O2 | 7/4/2020 6:00 AM   | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 48 hours |                                     |   |

## Boiler 1 CEMS Downtime

Colmac Energy

SO2 lb/mmBtu CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| SO2 lb/mmBtu   | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| SO2 lb/mmBtu   | 3/29/2020 12:00 AM | 9:59 AM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 3/31/2020 4:00 AM  | 10:59 AM | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 lb/mmBtu   | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 lb/mmBtu   | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| SO2 lb/mmBtu   | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| SO2 lb/mmBtu   | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| SO2 lb/mmBtu   | 7/4/2020 6:00 AM   | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 48 hours |                                     |   |

## Boiler 1 CEMS Downtime

Colmac Energy

SO2 lb/hr CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| SO2 lb/hr      | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| SO2 lb/hr      | 3/29/2020 12:00 AM | 3:59 AM  | 4 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 3/29/2020 5:00 AM  | 2:59 PM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 3/31/2020 4:00 AM  | 7:59 AM  | 4 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 lb/hr      | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 lb/hr      | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| SO2 lb/hr      | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| SO2 lb/hr      | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| SO2 lb/hr      | 7/4/2020 6:00 AM   | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 49 hours |                                     |   |

## Boiler 1 CEMS Downtime

Colmac Energy

CO ppm @3% O2 CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| CO ppm @3% O2  | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| CO ppm @3% O2  | 3/29/2020 12:00 AM | 9:59 AM  | 10 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/29/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/29/2020 4:00 PM  | 6:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/31/2020 4:00 AM  | 10:59 AM | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| CO ppm @3% O2  | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| CO ppm @3% O2  | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| CO ppm @3% O2  | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| CO ppm @3% O2  | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| CO ppm @3% O2  | 7/4/2020 6:00 AM   | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/31/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 53 hours |                                     |   |

# Boiler 1 CEMS Downtime

Colmac Energy  
CO lb/hr CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| CO lb/hr       | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| CO lb/hr       | 3/29/2020 12:00 AM | 2:59 PM  | 15 hours | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 3/29/2020 4:00 PM  | 6:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 3/31/2020 4:00 AM  | 7:59 AM  | 4 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 4/13/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| CO lb/hr       | 4/15/2020 2:00 PM  | 2:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| CO lb/hr       | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| CO lb/hr       | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| CO lb/hr       | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| CO lb/hr       | 7/4/2020 6:00 AM   | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 7/9/2020 3:00 PM   | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 7/10/2020 12:00 AM | 5:59 AM  | 6 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 7/31/2020 6:00 AM  | 6:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 54 hours |                                     |   |

## Boiler 2 CEMS Downtime

Colmac Energy

NOx ppm @3% O2 CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| NOx ppm @3% O2 | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| NOx ppm @3% O2 | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 3/13/2020 5:00 PM  | 7:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 3/29/2020 7:00 AM  | 8:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx ppm @3% O2 | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| NOx ppm @3% O2 | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| NOx ppm @3% O2 | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| NOx ppm @3% O2 | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| NOx ppm @3% O2 | 7/7/2020 3:00 AM   | 3:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 7/7/2020 9:00 AM   | 3:59 PM  | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 7/25/2020 3:00 PM  | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx ppm @3% O2 | 7/26/2020 12:00 AM | 4:59 AM  | 5 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 53 hours |                                     |   |

## Boiler 2 CEMS Downtime

Colmac Energy

NOx lb/mmBtu CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| NOx lb/mmBtu   | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| NOx lb/mmBtu   | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 3/13/2020 5:00 PM  | 7:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 3/29/2020 7:00 AM  | 8:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/mmBtu   | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| NOx lb/mmBtu   | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| NOx lb/mmBtu   | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| NOx lb/mmBtu   | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| NOx lb/mmBtu   | 7/7/2020 3:00 AM   | 3:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 7/7/2020 9:00 AM   | 3:59 PM  | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 7/25/2020 3:00 PM  | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/mmBtu   | 7/26/2020 12:00 AM | 4:59 AM  | 5 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 53 hours |                                     |   |

**Boiler 2 CEMS Downtime**  
Colmac Energy  
NOx lb/hr CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| NOx lb/hr      | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| NOx lb/hr      | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| NOx lb/hr      | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| NOx lb/hr      | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| NOx lb/hr      | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| NOx lb/hr      | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| NOx lb/hr      | 7/7/2020 9:00 AM   | 3:59 PM  | 7 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 7/25/2020 3:00 PM  | 11:59 PM | 9 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| NOx lb/hr      | 7/26/2020 12:00 AM | 4:59 AM  | 5 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 47 hours |                                     |   |



## Boiler 2 CEMS Downtime

Colmac Energy

SO2 ppm @3% O2 CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| SO2 ppm @3% O2 | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| SO2 ppm @3% O2 | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 3/13/2020 5:00 PM  | 7:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 3/29/2020 7:00 AM  | 8:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 ppm @3% O2 | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| SO2 ppm @3% O2 | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| SO2 ppm @3% O2 | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| SO2 ppm @3% O2 | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| SO2 ppm @3% O2 | 7/7/2020 3:00 AM   | 3:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 ppm @3% O2 | 7/25/2020 3:00 PM  | 10:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 40 hours |                                     |   |

## Boiler 2 CEMS Downtime

Colmac Energy

SO2 lb/mmBtu CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| SO2 lb/mmBtu   | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| SO2 lb/mmBtu   | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 3/13/2020 5:00 PM  | 7:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 3/29/2020 7:00 AM  | 8:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 lb/mmBtu   | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| SO2 lb/mmBtu   | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| SO2 lb/mmBtu   | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| SO2 lb/mmBtu   | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| SO2 lb/mmBtu   | 7/7/2020 3:00 AM   | 3:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/mmBtu   | 7/25/2020 3:00 PM  | 10:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 40 hours |                                     |   |

## Boiler 2 CEMS Downtime

Colmac Energy

SO2 lb/hr CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| SO2 lb/hr      | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| SO2 lb/hr      | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| SO2 lb/hr      | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| SO2 lb/hr      | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| SO2 lb/hr      | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| SO2 lb/hr      | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| SO2 lb/hr      | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| SO2 lb/hr      | 7/25/2020 3:00 PM  | 4:59 PM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 28 hours |                                     |   |

## Boiler 2 CEMS Downtime

Colmac Energy

CO ppm @3% O2 CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| CO ppm @3% O2  | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| CO ppm @3% O2  | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/12/2020 1:00 PM  | 1:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/13/2020 5:00 PM  | 7:59 PM  | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/13/2020 9:00 PM  | 10:59 PM | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/29/2020 7:00 AM  | 8:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 3/29/2020 10:00 AM | 10:59 AM | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| CO ppm @3% O2  | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| CO ppm @3% O2  | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| CO ppm @3% O2  | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| CO ppm @3% O2  | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| CO ppm @3% O2  | 7/7/2020 3:00 AM   | 3:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/7/2020 9:00 AM   | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/25/2020 3:00 PM  | 10:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO ppm @3% O2  | 7/26/2020 12:00 AM | 1:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 49 hours |                                     |   |

## Boiler 2 CEMS Downtime

Colmac Energy  
CO lb/hr CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter      | Start              | End      | Duration | Reason                              | Action  |
|----------------|--------------------|----------|----------|-------------------------------------|---|
| CO lb/hr       | 2/12/2020 4:00 AM  | 6:59 AM  | 3 hours  | Lost communication.                 | Rebooted CeDAR computer, and communication reestablished. |
| CO lb/hr       | 3/12/2020 9:00 AM  | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 3/12/2020 1:00 PM  | 1:59 PM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 3/13/2020 9:00 PM  | 10:59 PM | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 3/29/2020 10:00 AM | 10:59 AM | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 4/14/2020 7:00 AM  | 7:59 AM  | 1 hour   | CEM out of service for maintenance. | Maintenance complete, CEM in service.                     |
| CO lb/hr       | 4/26/2020 7:00 AM  | 7:59 AM  | 1 hour   | Boiler Shutdown                     | Shutdown complete   |
| CO lb/hr       | 5/28/2020 8:00 PM  | 11:59 PM | 4 hours  | Down For Calibration                | Completed Calibration                                     |
| CO lb/hr       | 5/29/2020 12:00 AM | 4:59 AM  | 5 hours  | Lost Communication                  | Restarted Communication                                   |
| CO lb/hr       | 6/1/2020 11:00 AM  | 11:59 AM | 1 hour   | CGA testing                         | CGA testing complete                                      |
| CO lb/hr       | 7/7/2020 9:00 AM   | 11:59 AM | 3 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 7/12/2020 4:00 PM  | 11:59 PM | 8 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 7/25/2020 3:00 PM  | 4:59 PM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| CO lb/hr       | 7/26/2020 12:00 AM | 1:59 AM  | 2 hours  | CEM out of service for maintenance. | Maintenance complete, CEM back in service.                |
| Total duration |                    |          | 37 hours |                                     |   |

## Boilers Stack CEMS Downtime

Colmac Energy

Opacity % 6-Min Avg CEMS Downtime for 2/2/2020 thru 8/2/2020

| Parameter           | Start              | End      | Duration            | Reason                             | Action  |
|---------------------|--------------------|----------|---------------------|------------------------------------|---|
| Opacity % 6-Min Avg | 2/12/2020 4:18 AM  | 4:59 AM  | 42 minutes          | Lost communication.                | Rebooted CeDAR computer, and communication reestablished. |
| Opacity % 6-Min Avg | 2/12/2020 5:06 AM  | 5:59 AM  | 54 minutes          | Lost communication.                | Rebooted CeDAR computer, and communication reestablished. |
| Opacity % 6-Min Avg | 2/12/2020 6:06 AM  | 6:47 AM  | 42 minutes          | Lost communication.                | Rebooted CeDAR computer, and communication reestablished. |
| Opacity % 6-Min Avg | 2/20/2020 7:24 PM  | 7:47 PM  | 24 minutes          | CeDAR computer lost communication. | Rebooted CeDAR computer, and communication reestablished. |
| Opacity % 6-Min Avg | 3/9/2020 7:18 AM   | 7:59 AM  | 42 minutes          | Opacity monitor audit.             | Audit completed, monitor is back in service.              |
| Opacity % 6-Min Avg | 3/9/2020 8:12 AM   | 11:23 AM | 3 hours, 12 minutes | Opacity monitor audit.             | Audit completed, monitor is back in service.              |
| Opacity % 6-Min Avg | 4/17/2020 3:30 PM  | 3:47 PM  | 18 minutes          | Lost Communication                 | Communication back  |
| Opacity % 6-Min Avg | 5/28/2020 8:12 AM  | 9:11 AM  | 1 hour              | Calibration                        | Completed Calibration                                     |
| Opacity % 6-Min Avg | 5/28/2020 9:54 AM  | 10:11 AM | 18 minutes          | Calibration                        | Completed Calibration                                     |
| Opacity % 6-Min Avg | 5/28/2020 10:18 AM | 10:29 AM | 12 minutes          | Calibration                        | Completed Calibration                                     |
| Opacity % 6-Min Avg | 5/28/2020 10:30 AM | 11:11 AM | 42 minutes          | Down For Calibration               | Completed Calibration                                     |
| Opacity % 6-Min Avg | 5/28/2020 8:12 PM  | 11:59 PM | 3 hours, 48 minutes | Down For Calibration               | Completed Calibration                                     |
| Opacity % 6-Min Avg | 5/29/2020 12:06 AM | 12:59 AM | 54 minutes          | Lost Communication                 | Restarted Communication                                   |
| Opacity % 6-Min Avg | 5/29/2020 1:06 AM  | 1:59 AM  | 54 minutes          | Lost Communication                 | Restarted Communication                                   |
| Opacity % 6-Min Avg | 5/29/2020 2:06 AM  | 2:59 AM  | 54 minutes          | Lost Communication                 | Restarted Communication                                   |
| Opacity % 6-Min Avg | 5/29/2020 3:06 AM  | 3:59 AM  | 54 minutes          | Lost Communication                 | Restarted Communication                                   |
| Opacity % 6-Min Avg | 5/29/2020 4:06 AM  | 4:59 AM  | 54 minutes          | Lost Communication                 | Restarted Communication                                   |
| Opacity % 6-Min Avg | 6/10/2020 5:24 AM  | 6:59 AM  | 1 hour, 36 minutes  | calibrating opacity monitor        | Cal complete  |
| Opacity % 6-Min Avg | 6/30/2020 5:24 AM  | 8:05 AM  | 2 hours, 42 minutes | Opacity maintenance/calibration    | Maintenance/calibration completed                         |
| Opacity % 6-Min Avg | 7/14/2020 10:30 AM | 11:53 AM | 1 hour, 24 minutes  | Opacity monitor calibration        | Calibration complete, back in service                     |
| Opacity % 6-Min Avg | 7/14/2020 11:06 PM | 11:17 PM | 12 minutes          | Opacity monitor calibration        | Calibration complete, back in service                     |
| Opacity % 6-Min Avg | 7/27/2020 8:36 PM  | 8:59 PM  | 24 minutes          | Opacity monitor calibration.       | Calibration complete, back in service.                    |

| Parameter      | Start | End | Duration             | Reason | Action |
|----------------|-------|-----|----------------------|--------|--------|
| Total duration |       |     | 23 hours, 42 minutes |        |        |



July 31, 2020

US EPA Region 9  
ATTN: Air Section, ENF-2-1  
75 Hawthorne Street  
San Francisco, CA 94105

**Subject: Desert View Power Permit #CB-OP 99-01 Annual Boiler MACT Compliance Test, Excess HCl Emissions**

Dear Sir/Madam,

This letter serves as the required follow up to the 48 hr. notification, that was sent via email, to [AEO\\_R9@epa.gov](mailto:AEO_R9@epa.gov) on July 24, 2020. The email was a notice of an exceedance of HCl that occurred during the annual Boiler MACT compliance test for Desert View Power (DVP). Per PSD permit SE 87-01 Condition III.C.2.b, below is a description of events, and the probable cause of failure.

On June 3, 2020, Desert View Power completed the annual boiler MACT compliance testing. The results of the HCl testing are obtained by using the wet chemistry Method 26a (40 CFR Part 63 Subpart DDDDD, Table 5). The results of this test are not instantaneous and requires samples to be sent to a lab for analysis.

On June 19, 2020, Montrose Air informed DVP that based on estimated heat input values taken from prior testing, Unit 1 and Unit 2 may have potentially exceeded the 0.022 lb/MMBtu limit for HCl.

DVP began a review of potential sources that could cause excess HCl emissions. DVP reviewed its CEMS data for SO<sub>2</sub> (operating parameter used for continuous compliance demonstration for HCl), and the values were well below the established operating limit. The monthly average emission reports (May 2019-June 2020) indicated the highest 30-day rolling average for Unit 1 was 14.43 ppm @ 3% O<sub>2</sub> and for Unit 2 was 14.5 ppm @ 3% O<sub>2</sub> compared to an operating limit of 27 ppm@ 3% O<sub>2</sub>.

Subsequently, an outage was scheduled on June 26-June 27, 2020 to inspect the hydrated lime injection system, which is used to reduce HCl emissions. The hydrated lime injection system consists of a storage tank, blowers to convey the hydrated lime to the injection location, and 4 injection nozzles per boiler. During the inspection, the maintenance department found that one injection nozzle on Unit 1 was 90% plugged. The other 3 nozzles had some light blockage, but typical for this type of system. Unit 2's nozzles had typical light blockage, but the injection line pressure was still elevated, indicating possible plugging elsewhere in the line. The system was once again isolated, and maintenance



discovered that the conveying line and sweeping elbow were about 60% plugged. This was an abnormal condition and has not occurred in the past.

During DVP's previous scheduled maintenance outage (April 27-May 14, 2020), DVP inspected all injection nozzles and performed a routine cleaning. This occurred prior to the stack test. At that time, line pressures appeared to be normal.

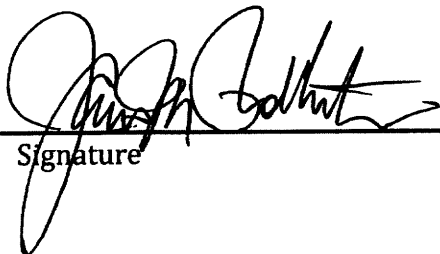
On July 23, 2020, Montrose Air issued our final MACT test report. The HCl emission result for Unit 1 was 0.0248 lb/MMBtu, and 0.0481 lb/MMBtu for Unit 2, both above the 0.022lb/MMBtu emissions limit. Note that since 2016, DVP has not failed a compliance test for HCl emissions. DVP believes that the blocked sweeping elbow in the hydrated lime line on Unit 2 and the plugged lance on Unit 1 were directly related to the exceedance of HCl. As a result of this discovery, DVP will add inspection of the sweeping elbow portion of the line to its hydrated lime injection maintenance activities and monitor injection lances closely. DVP will also schedule a re-test using the Method 26a to demonstrate compliance as soon as a contractor is available for testing.

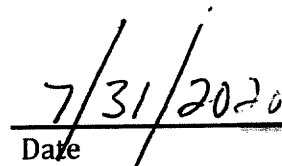
Desert View Power is requesting that the USEPA waive the requirement for a 60-day test notification in Boiler MACT. We will notify the USEPA and SCAQMD of the test date as soon as it is known but anticipate the third week of August.

If you have any questions or require any other information, please do not hesitate to contact me.

#### **CERTIFICATION**

I certify, under penalty of law, that this document and all attachments was prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquire of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware of significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Date



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**Desert View Power**  
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**Mecca, CA 92554**  
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**jrobertson@greenleaf-power.com**

**CC     Mr. Kenneth Dudash**  
**South Coast Air Quality Management District**

**Mr. Andrew Chew**  
**U.S. EPA, Region 9**

**Mr. Scott Connelly**  
**U.S. EPA, Region 9,**

